

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED FORTY-EIGHTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO CLAIMS FOR WHICH THE DEBTOR IS NOT LIABLE

Upon the *Five Hundred Forty-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for which the Debtor Is Not Liable* (the “Five Hundred Forty-Eighth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth” or “Objecting Debtor”), dated October 28, 2022, for entry of an order disallowing in their entirety

¹ The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Forty-Eighth Omnibus Objection.

certain claims filed against the Objecting Debtor, as more fully set forth in the Five Hundred Forty-Eighth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-Eighth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Forty-Eighth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Forty-Eighth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor any of the other Title III Debtors are liable; and the Court having determined that the relief sought in the Five Hundred Forty-Eighth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-Eighth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Forty-Eighth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22752 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-Eighth Omnibus Objection

Five Hundred Forty-Eighth Omnibus Objection
Exhibit A - Claims to Be Disallowed

					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
1 CRUZ CARLO, JOSE M HC 66 BOX 10317 FAJARDO, PR 00738	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28527	\$381,600.00*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.</p> <p>Claim #28527 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified, the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed, and the 541st Omnibus Claims Objection for Claims to Be Disallowed.</p>					
2 JOHNSON ROSARIO, EVELYN VILLA CADIZ 424 CALLE OLOT SAN JUAN, PR 00923	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27751	\$400,248.00*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.</p> <p>Claim #27751 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified, the 541st Omnibus Claims Objection for Claims to Be Disallowed, and the 547th Omnibus Claims Objection for Claims to Be Disallowed.</p>					

Five Hundred Forty-Eighth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
3	MONTANEZ JOHNSON, GLENDA J URBOPEN LAND 424 CALLE OLOT SAN JUAN, PR 00923	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29525	\$108,000.00*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.</p> <p>Claim #29525 also contained on Exhibit A to the 345th Omnibus Claims Objection for Claims to Be Reclassified, the 541st Omnibus Claims Objection for Claims to Be Disallowed, and the 547th Omnibus Claims Objection for Claims to Be Disallowed.</p>						
4	PEREZ PENA, LEYDA M. URB. VENUS GARDENS NORTE AZ-19 C/ SONOR 9 SAN JUAN, PR 00926	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	156068-1	Undetermined*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 30851 and 104175, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Pérez Colón. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.</p>						

Five Hundred Forty-Eighth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	PRADO RODRIGUEZ, BIENVENIDA HC-01 BOX 4156 NAGUABO, PR 00718	02/03/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	173104-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in either litigation, and there is therefore no basis for the claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever. Claim #173104-1 also contained on Exhibit A to the 549th Omnibus Claims Objection for Claims to Be Disallowed.						
6	RAMOS RODRIGUEZ, DIANA E. URB. BRISAS DEL PRADO CALLE GARZA 1730 SANTA ISABEL, PR 00757	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	123524-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in either litigation, and there is therefore no basis for the claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
7	RODRIGUEZ FARIA, MARILYN URB PASEO SOL Y MAR CALLE CORAL 640 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14149	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in any of the litigation, and there is therefore no basis for the claimant to assert liabilities associated with any of the litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in any of the litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations. Claim #14149 also contained on Exhibit A to the 549th Omnibus Claims Objection for Claims to Be Disallowed.						

Five Hundred Forty-Eighth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
8	SANTIAGO RENTA, ANAIDA M. HC 5 BOX 5624 JUANA DÍAZ, PR 00759	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11726	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, the claimant is not a named plaintiff in any of the litigation, and there is therefore no basis for the claimant to assert liabilities associated with any of the litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in any of the litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations.						
9	TRUJILLO PLUMEY, ROSAMAR COND. TIERRA DEL SOL APT 122 HUMACAO, PR 00791	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29473	\$453,600.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #29473 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 541st Omnibus Claims Objection for Claims to Be Disallowed.						
10	VILLODAS MELENDEZ, WILFREDO APT 850 PATILLAS, PR 00723	10/04/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	171202-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Alfredo Maldonado Colón et al. v. Puerto Rico Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, the claimant is not a named plaintiff in that litigation, and there is therefore no basis for the claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if the claimant were in fact a plaintiff in that litigation, that portion of the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colón. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
TOTAL						\$1,343,448.00*